UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

LATOYA KAIGLER,		
	Plaintiff,	Civil Action No.:
VERSUS		Section: Judge
INSTANT BRANDS, IN	С.,	Division: Magistrate Judge
	Defendant.	JURY TRIAL DEMANDED

COMPLAINT FOR DAMAGES

TO THE HONORABLE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF LOUISIANA AND THE JUDGES THEREOF:

The complaint of Latoya Kaigler, a person of the full age of majority, through undersigned counsel, alleges the following upon personal knowledge and belief, and investigation of counsel:

NATURE OF THE CASE

- 1. Defendant Instant Brands designs, manufactures, markets, imports, distributes and sell a wide-range of consumer kitchen products, including the subject "Instant Pot Programmable Electric Pressure Cooker," which specifically includes the Model Number IP-DUO60 V3 (referred to hereafter as "pressure cooker(s)") that is at issue in this case.
- 2. Defendant touts the "safety" of its pressure cookers, and states that they cannot be opened while in use. Despite Defendant's claims of "safety," it designed, manufactured, marketed, imported, distributed and sold, both directly and through third-party retailers, a product that suffers

¹ See, e.g. Instant Pot IP-DUO 60 Owner's manual, pg. 22. A copy of the Owner's manual is attached hereto as "Exhibit A".

from serious and dangerous defects. Said defects cause significant risk of bodily harm and injury to its consumers.

- 3. Specifically, said defects manifest themselves when, despite Defendant's statements, the lid of the pressure cooker is removable with built-up pressure, heat and steam still inside the unit. When the lid is removed under such circumstances, the pressure trapped within the unit causes the scalding hot contents to be projected from the unit and into the surrounding area, including onto the unsuspecting consumers, their families and other bystanders. The Plaintiff in this case was able to remove the lid while the pressure cooker retained pressure, causing her serious and substantial bodily injuries and damages including, but not limited to, 2nd degree burns to her abdomen.
- 4. Defendant knew or should have known of these defects, but has nevertheless put profit ahead of safety by continuing to sell its pressure cookers to consumers, failing to warn said consumers of the serious risks posed by the defects, and failing to recall the dangerously defective pressure cookers regardless of the risk of significant injuries to Plaintiff and consumers like her.
- 5. Defendant ignored and/or concealed its knowledge of these defects in its pressure cookers from the Plaintiff in this case, as well as the general public, in order to continue generating a profit from the sale of said pressure cookers, demonstrating a callous, reckless, willful, and deprayed indifference to the health, safety and welfare of Plaintiff and consumers like her.
- 6. As a direct and proximate result of Defendant's conduct, the Plaintiff in this case incurred significant and painful bodily injuries, medical expenses, lost wages, physical pain, mental anguish, and diminished enjoyment of life.

PLAINTIFF LATOYA KAIGLER

- 7. Plaintiff is a resident and citizen of the city of Marrero, Jefferson Parish, State of Louisiana.
- 8. On or about July 18, 2018, Plaintiff purchased a new pressure cooker, Model No. IP-DUO60 V3.
- 9. On or about March 22, 2019, Plaintiff suffered serious and substantial burn injuries as the direct and proximate result of the pressure cooker's lid being able to be rotated and opened while the pressure cooker was still under pressure, during the normal, directed use of the Pressure Cooker, allowing its scalding hot contents to be forcefully ejected from the pressure cooker and onto Plaintiff. The incident occurred as a result of the failure of the pressure cooker's supposed "safety mechanisms," which purport to keep the consumer safe while using the pressure cooker. In addition, the incident occurred as the result of Defendant's failure to redesign the pressure cooker, despite the existence of economical, safer alternative designs.

INSTANT BRANDS, INC.

- 10. Defendant designs, manufactures, markets, imports, distributes and sells a variety of consumer kitchen products including pressure cookers, air fryers, and blenders, amongst others.
- 11. Defendant boasts that "[t]he Instant Pot line of products are truly tools for a new lifestyle and especially cater to the needs of health-minded individuals" with its "main goal" to provide the "best kitchen experience by offering unsurpassed user interface design and connected technologies."

 $^{^{2}}$ *Id.* at pg. 5.

³ See https://instantpot.com/about-instant-brands-inc-instant-pot/ (last accessed September 19, 2019)

⁴ Id.

- 12. Defendant Instant Brands is a Canadian corporation with is principal place of business at 495 March Road, Suite 200, Kanata, ON, Canada K2K 3G1, and as such is deemed to be a citizen of the Country of Canada.
- 13. Upon information and belief, prior to March 8, 2018, Defendant Instant Brands was known as "Double Insight, Inc. d/b/a The Instant Pot Company", and have each held themselves out as the designers, manufacturers, and/or distributors of the Instant Pot.

JURISDICTION AND VENUE

- 14. This Court has subject matter jurisdiction over this case pursuant to diversity jurisdiction prescribed by 28 U.S.C. § 1332 because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and there is complete diversity between the parties.
- 15. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 because all or a substantial part of the events or omissions giving rise to this claim occurred in this district.
- 16. Venue is also proper in this Court pursuant to 28 U.S.C. § 1391 because Defendant has sufficient minimum contacts with the State of Louisiana and intentionally availed itself of the markets within Louisiana through the promotion, sale, marketing, and distribution of its products.

FACTUAL BACKGROUND

- 17. Defendant is engaged in the business of designing, manufacturing, warranting, marketing, importing, distributing and selling the pressure cookers at issue in this litigation.
- 18. Defendant aggressively warrants, markets, advertises and sells its pressure cookers as "Convenient, Dependable and Safe," ⁵ allowing consumers to cook "healthy, tasty dishes." ⁶

⁵ See https://instantpot.com/portfolio-item/lux-6-quart/#tab-id-1 (last accessed September 25, 2019).

⁶ *Id*.

- 19. For instance, the Defendant claims "As a safety feature, until the float valve drops down the lid is locked and cannot be opened." ⁷
- 20. To further propagate its message, Defendant has, and continue to utilize numerous media outlets including, but not limited to, infomercials, social media websites such as YouTube, and third-party retailers. For example, the following can be found on Defendant's YouTube webpage entitled "Getting to Know Your New Instant Pot IP-DUO":
 - a. "The first thing you need to know about your IP-DUO is that you don't need to be afraid of it, as many people are afraid of stovetop pressure cookers."
 - b. "With 10 safety features built in, you can use your Instant Pot with confidence, *knowing that it is not going to explode*." 9
 - c. "In addition, keep in mind that your Instant Pot operates at relatively low pressures of 11 to 12 psi or lower, depending on the pressure setting that you use." ¹⁰
- 21. In a similar video entitled "Introducing Instant Pot IP-DUO series electric pressure cooker," spokesperson Laura Pazzaglia, founder of the website "Hip Pressure Cooking" boasts of the pressure cookers "10 safety features," stating that this "new model detects the position of the lid" and "once the lid is locked, and the contents are under pressure, there's no way to open the pressure cooker." 14

⁷ Instant Pot IP-DUO 60 V3 Owner's manual, pg. 22,

⁸ https://www.youtube.com/watch?v=w1RKj9E8TY0 (video with a runtime of 11:26) at 0:42 – 0:46 (last accessed September 19, 2019)

⁹ *Id.* at 0:47 - 0:55.

 $^{^{10}}$ Id. 0:56-1:08. This apparently suggests that even if the lid is opened while the unit is still pressurized, it will not harm you.

¹¹ See https://www.hippressurecooking.com/ (last accessed September 19, 2019)

¹² See https://www.youtube.com/watch?v=bVA2EqPf0s0 at 1:22 – 143. (last accessed September 19, 2019)

¹³ Id. at 2:26

¹⁴ Id. at 6:40

- 22. According to the Owner's Manual accompanying each individual unit sold, the pressure cookers purport to be designed with "10 proven safety mechanisms and patented technologies," ¹⁵ misleading the consumer into believing that the pressure cookers are reasonably safe for its normal, intended use.
- 23. By reason of the forgoing acts or omissions, the above-named Plaintiff and/or her family purchased the pressure cooker with the reasonable expectation that it was properly designed and manufactured, free from defects of any kind, and that it was safe for its intended, foreseeable use of cooking.
- 24. Plaintiff used her pressure cooker for its intended purpose of preparing meals for herself and/or family and did so in a manner that was reasonable and foreseeable by the Defendant.
- 25. However, the aforementioned pressure cooker was defectively and negligently designed and manufactured by the Defendant in that it failed to properly function as to prevent the lid from being removed with normal force while the unit remained pressurized, despite the appearance that all the pressure had been released, during the ordinary, foreseeable and proper use of cooking food with the product; placing the Plaintiff, her family, and similar consumers in danger while using the pressure cookers.
- 26. Defendant's pressure cookers possess defects that make them unreasonably dangerous for its intended use by consumers because the lid can be rotated and opened while the unit remains pressurized.
- 27. Further, Defendant's representations about "safety" are not just misleading, they are flatly wrong, and put innocent consumers like Plaintiff directly in harm's way.

¹⁵ See Instant Pot IP-DUO 60/80 Owner's manual, pg. 4.

- 28. Economic, safer alternative designs were available that could have prevented the Pressure Cooker's lid from being rotated and opened while pressurized.
- 29. Defendant knew or should have known that its pressure cookers possessed defects that pose a serious safety risk to Plaintiff and the public. Nevertheless, Defendant continues to ignore and/or conceal its knowledge of its pressure cookers' defects from the general public and continues to generate a substantial profit from the sale of its pressure cookers.
- 30. As a direct and proximate result of Defendant's intentional concealment of such defects, its failure to warn consumers of such defects, its negligent misrepresentations, its failure to remove a product with such defects from the stream of commerce, and its negligent design of such products, Plaintiff used an unreasonably dangerous pressure cooker, which resulted in significant and painful bodily injuries upon Plaintiff's simple removal of the lid of the Pressure Cooker.
- 31. Consequently, the Plaintiff in this case seeks compensatory damages resulting from the use of Defendant's pressure cooker as described above, which has caused the Plaintiff to suffer from serious bodily injuries, medical expenses, lost wages, physical pain, mental anguish, diminished enjoyment of life, and other damages.

CAUSES OF ACTION PURSUANT TO THE LOUISIANA PRODUCTS LIABILITY ACT (LSA-R.S. 9:2800.52, ET SEO.)

- 32. Plaintiff incorporates by reference each preceding and succeeding paragraph as though set forth fully at length herein.
- 33. At the time of Plaintiff's injuries, Defendant's pressure cookers were defective and unreasonably dangerous for use by foreseeable consumers, including Plaintiff.

- 34. Defendant's actions and omissions were the direct and proximate cause of the Plaintiff's injuries and damages.
- 35. Defendant, under all applicable laws including, but not limited to, the Louisiana Products Liability Act, LSA-R.S. 9:2800.52 et seq., is liable unto Plaintiff for her injuries and damages for designing, manufacturing, assembling, marketing, distributing, and/or selling the aforesaid pressure cooker that was unreasonably dangerous in construction or composition, in design, because inadequate warnings about the product had not been provided, and/or because the pressure cooker did not conform to the implied and express warranties of the manufacturer about this product.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory damages, together with interest, costs of suit, attorneys' fees, and all such other relief as the Court deems proper.

INJURIES & DAMAGES

- 36. As a direct and proximate result of Defendant's negligence and wrongful misconduct as described herein, Plaintiff has suffered and will continue to suffer physical and emotional injuries and damages, including past, present, and future physical and emotional pain and suffering, as a result of the burn injuries she suffered from the incident on or about March 22, 2019.
- 37. As a direct and proximate result of Defendant's negligence and wrongful misconduct, Plaintiff has incurred and will continue to incur the loss of full enjoyment of life and physical disfigurement as a result of the burn injuries she suffered from the incident on or about March 22, 2019.

- 38. As a direct and proximate cause of Defendant's negligence and wrongful misconduct, Plaintiff has and will continue to incur expenses for medical care and treatment, as well as other expenses, as a result of the burn injuries she suffered from the incident on or about March 22, 2019.
- 39. Plaintiff's damages exceed \$75,000.00 as required by 28 U.S.C. § 1332(a), and Plaintiff is entitled to recover the foregoing damages from Defendant in an amount to be proven at trial.

JURY TRIAL DEMANDED

40. Plaintiff is entitled to and demands a trial by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment against the Defendant for damages, including exemplary damages if applicable, to which they entitled by law, as well as all costs of this action, interest and attorneys' fees, to the full extent of the law, whether arising under the common law and/or statutory law, including:

- a. judgment for Plaintiff and against Defendant;
- b. damages to compensate Plaintiff for her injuries, economic losses and pain and suffering sustained as a result of the use of the Defendant's pressure cookers;
- c. pre and post judgment interest at the lawful rate;
- d. a trial by jury on all issues of the case; and
- e. for any other relief as this Court may deem equitable and just, or that may be available under the law of another forum to the extent the law of another forum is applied, including but not limited to all reliefs prayed for in this Complaint and in the foregoing Prayer for Relief.

Respectfully submitted,

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Pictures in manual are for reference only. Please refer to actual product.



SAVE THESE INSTRUCTIONS

When using pressure cookers, basic safety precautions should always be followed.

- 1) Do not touch hot surfaces of pressure cooker. Use side handles for carrying.
- 2) Do not place the cooker on or near a hot gas or electric burner, or in a heated oven.
- 3) Intended for countertop use only.
- 4) Do not use pressure cooker for anything other than intended use.
- 5) Never deep fry or pressure fry in the cooker with oil.
- 6) Do not let cord hang over edge of table or counter, or touch hot surfaces.
- 7) Do not use cooker in electrical systems other than 110-120V~/60Hz for North America.
- 8) Do not operate cooker with damaged cord or plug, or after the cooker malfunctions or has been damaged in any manner.
- 9) Do not open the cooker until the cooker has cooled and all internal pressure has been released. If the float valve is still up or the lid is difficult to turn, it is an indication that the cooker is still pressurized - do not force it open. Please see "Getting Started" pages 12-14.



10) For all pressure cooking programs, the total amount of pre-cooked food and liquid in the inner pot should not pass the 2/3 line. When cooking food that expands during cooking such as rice, beans or vegetables, food should not pass the 1/2 line. Over filling may risk clogging the steam release and developing excess pressure. This may also cause leakage, personal injuries, or damage to the cooker. These fill level warnings do not apply to non-pressure cooking programs.

Please read this manual carefully and retain for future reference.



- 11) Make sure the steam release handle is in the Sealing position for all the pressure cooking programs.
- 12) This appliance should not be used by or near children or by individuals with disabilities or limited knowledge in using pressure cookers.
- 13) Do not immerse the cooker base in water. To protect against electrical shock, do not immerse the cord, power plug, or cooker in any liquid.
- 14) Always attach plug to the cooker first, then plug cord into the wall outlet. To disconnect, press Cancel, then remove plug from the wall outlet. Unplug from power outlet when not in use or before cleaning. Allow the cooker to cool before putting on or taking off parts, and before cleaning.
- 15) For Household use only. Not intended for outdoor use.
- 16) Extreme caution must be used when moving a pressure cooker containing hot liquids.
- 17) This appliance cooks under pressure. Improper use may result in scalding injuries. Make certain the lid is properly closed before operating. Caution: To reduce the risk of electric shock, cook only in removable containers. See "Getting Started" pages 12-14.
- 18) Use of accessories and parts that are not branded Instant Pot® or recommended by the Instant Pot® Company may cause the cooker to malfunction. Cook only in Instant Pot® stainless steel or ceramic non-stick inner pots for best results. Other brands may not have the correct curvature to match the heating element.



19) Be aware that certain foods, such as applesauce, cranberries, pearl barley, oatmeal or other cereals, split peas, noodles, macaroni, rhubarb, or spaghetti can foam, froth, sputter, and clog the steam release. These foods should not be cooked under pressure cooking settings unless as directed in Instant Pot® cooker recipes.



Please read this manual carefully and retain for future reference.



- 20) Always check the steam release valve, float valve and anti-block shield for clogging before use.
- 21) When installing the sealing ring, make sure the sealing ring rack is completely set in the groove on the inside of the sealing ring.









When in operation or releasing pressure DO NOT place unprotected skin over the steam release valve.

Do not move cooker when it is in operation





Do not force lid open when the float valve is UP. Make sure the float valve is DOWN when you open the lid.



Please read this manual carefully and retain for future reference.



WARNING: Spilled food can cause serious burns. Keep appliance and cord away from children. Never drape cord over edge of counter, never use power outlet below counter, and never use with an extension cord.

Special Cord Set Instructions

As per UL safety requirement, a short power supply cord (0.6 m to 0.9 m) is provided to reduce the hazards resulting from entanglement and tripping.

This appliance has a 3-prong grounding plug. To reduce the risk of electric shock, plug the power cord into a grounded (earthed) electrical outlet that is easily accessible.

Specifications

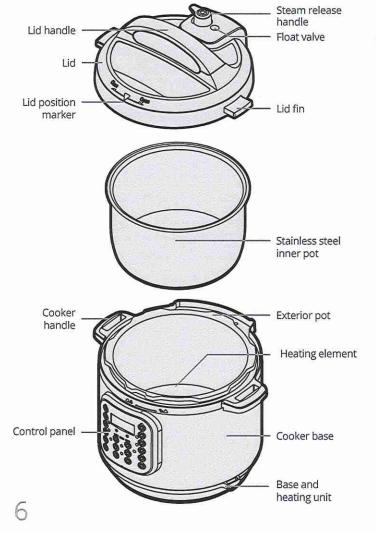
Model	Power Supply	Rated Power	Volume	Inner Pot Dimensions	Product Dimensions	Weight
IP-DUO60 V3	120V~ 60Hz	1000 W	6 quart	15.7x 23.9cm 6.2 x 9.4 in.	33 x 31 x 32 cm 13 x 12.2 x 12.6 in.	6.75 kg 14.8 lbs
IP-DUO80 V2		1200 W	8 quart	17.5 x 26.4 cm 6.9 x 10.4 in	37.6 x 33.8 x 36.1 cm 14.8 x 13.3 x 14.2 in	8.21 kg 18 lbs

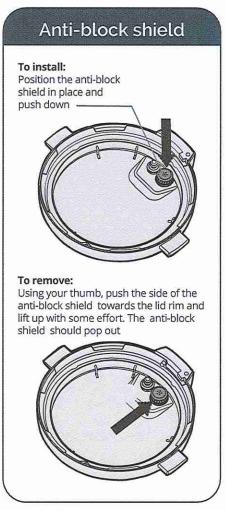
Working Pressure:

Low Pressure: 5.8 - 7.2 PSI (40-50kPa): High Pressure: 10.2 - 11.6 PSI (70-80 kPa)

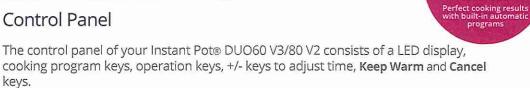


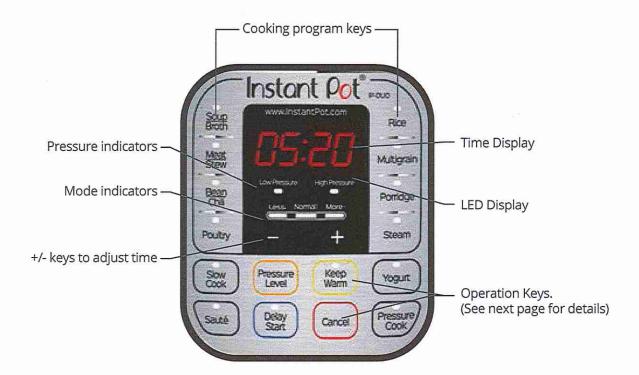
Overview





Control Panel





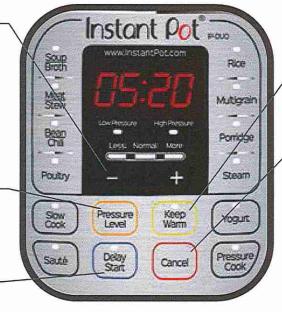
Control Panel

Instant Pot® is a programmed smart cooker that has preset cooking instructions for different food ingredients and cooking methods. It also remembers your most recent setting per cooking program for a more personalized cooking experience. To return to the factory default settings, return the cooker to standby mode displaying OFF, 1) for individual cooking programs reset, press and hold the cooking program key until the cooker beeps, or 2) for global reset, press and hold the **Cancel** key until the cooker beeps.

Sound ON/OFFPress and hold the - Key
for 3 seconds to turn
sound OFF.
Press and hold the + key
for 3 seconds to turn
sound ON

The **Pressure Level** key toggles between High and Low pressure settings for pressure cooking programs

The **Delay Start** key sets the delay time before a cooking program starts.



The **Keep Warm** key turns the **Auto Keep Warm** function ON and OFF

The Cancel key ends a cooking program at any time, or resets the cooker to factory default settings by pressing and holding this key until the cooker beeps

The Pressure Level key has no effect on non-pressure cooking programs: Slow Cook, Sauté and Yogurt.



Cooking Program Options

Programs	Modes	Suggested Uses	Notes for Users	
	Less	Soup without meat.	The soup/broth remains	
Soup	Soup Normal	Soup with meat.	clear due to lack of boiling motion under pressure	
Broth	More	Rich bone broth.	cooking.	
	Less	Soft texture.	Choose different modes	
Meat Stew	Normal	Very soft texture.	based on the meat texture desired.	
	More	Fall-off-the bone meat texture.		
	Less	Less soft texture.	Choose different modes based on the bean texture desired.	
Bean Chili	Normal	Soft texture.		
	More	Very soft texture.		
	Less	Soft texture	Choose different modes	
Poultry	Normal	Very soft texture	based on the meat texture desired.	
	More	Fall-off-the-bone texture		
	Less Corresponds to Low setting in a temperature controlled slow cooker		Non-pressure cooking program. You may also use the Instant Pot® glass lid as	
Slow Cook	Normal	Corresponds to Medium setting in a temperature controlled slow cooker	an option.	
	More	Corresponds to High setting in a temperature controlled slow cooker		

Cooking Program Options

rograms	Modes	Suggested Uses	Notes for Users	
	Less	Al dente white rice.	Automated cooking program. LED displays	
Rice Normal	Normal texture white rice.	'Auto'. Cooking time		
	More	Softer texture white rice.	depends on amount of ri in the cooker.	
	Less	Wild rice, brown rice, mung beans, etc.	Choose different modes based on the type of grains and the desired texture.	
Multigrain	Normal	Wild rice, brown rice, mung beans, etc.		
wategrani	More	Tough grains or a mixture of grains and beans.	Program includes 45 minutes of warm water soaking time prior to 60 minutes of pressure cooking.	
	Less	Oatmeal.	DO NOT use Quick Releas	
Porridge	Normal	White rice porridge/congee.	as thick liquid will spatter out and block the steam	
;;	More	Rice porridge/congee with a mixture of rices and beans.	release valve. See page 17.	
	Less	Vegetables.	Use the steam rack	
Steam	Normal	Fish and Seafood.	provided to elevate food above the water. Use Quic	
	More	Meat.	Release method to preven food from overcooking.	
	Less	Simmering, thickening and reducing liquids.	NEVER have the lid on whe sauteing. Maximum time is	
Sauté (Brown)	Normal	Regular stir-fry.	30 minutes as a safety precaution.	
on a	More	Pan searing or browning meat.		

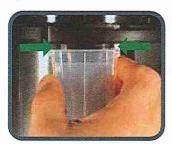
Cooking Program Options

Programs	Modes	Suggested Uses	Notes for Users
	Less	Jiu Niang, a sweet fermented glutinous rice dessert.	Default fermentation time is 24:00 hours. You can adjust time based on your recipe.
Yogurt	Normal	Fermenting milk when making yogurt.	'Yogt' will be displayed on the screen when completed.
	More	Pasteurizing milk when making yogurt.	'boiL' will be displayed on the screen.
	Less		Press the Pressure Level
Pressure	Normal		key to adjust pressure levels and the + / - keys to change cooking time.
Cook	More	favourite recipes or cooking habits.	change cooking time.

Getting Started

- Read warning card and warning stickers. Remove all packaging materials and removable warning cards from the cooker and accessories.
- Clean the inner pot, lid and accessories with water and detergent before the first use.
- Install the condensation collector at the rear of the cooker by aligning the top of the collector with the guides on the cooker and press in.





Place the steam release handle on the lid.





The steam release handle does not lock tight into the lid but will fit loosely.

Getting Started

Before using your Instant Pot®:

To remove the lid, hold the handle, turn the lid counterclockwise and lift.







- Remove the inner pot from the cooker.
- Add food and liquids to the inner pot as the recipe directs. If steaming, place the steam rack on the bottom of the inner pot first. See "Cooking and Safety Tips" on page 22 for minimum liquid requirement for pressure cooking.
- Wipe the outside of the inner pot dry. Make sure there is no food debris on the heating element.
- Put the inner pot back into the cooker. Rotate slightly to ensure that it is seated correctly.



- When installing the sealing ring, make sure the sealing ring rack is completely set in the groove on the inside of the sealing ring. Ensure there is no deformation on the sealing ring rack. Do not attempt to repair a deformed ring rack.
- To place lid, reverse Step 1. Place the lid on the cooker, align the mark on the lid with the dunlock) mark and turn clockwise to the def (lock) mark.

Getting Started



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- Make sure the steam release valve, float valve and anti-block shield are clean and free from debris.
- After putting the lid on, make sure the float valve on lid top drops down.
- · Do not put the lid on for the Sauté program.



Initial Test Run

To familiarize yourself with the Instant Pot® and check if the cooker is working properly:

- Add 3 cups of water into the inner pot using the plastic measuring cup provided.
- Close the lid. Turn steam release handle to Sealing position.
- Press the **Steam** button and press the + / keys to adjust steaming time to 2 minutes.



The preheating cycle will start **after 10 seconds** and the cooker with display **On**. Traces of steam may release until the float valve pops up. The **Steam** program will begin after a few minutes when working pressure is reached. The cooker will beep and switch to **Keep Warm** mode if the **Auto Keep Warm** function is **ON**.

If anything seems to go wrong or if in doubt, refer to the troubleshooting guide on pages 24 - 26, or call the customer care team. Contact information on page 24.

Pressure Cooking

The following pressure cooking programs are available: Soup/Broth, Meat/Stew, Bean/Chili, Poultry, Rice, Multigrain, Porridge, Steam, or Pressure Cook.



- Do not fill the inner pot more than 2/3 full. For food that expands during cooking such as rice or dried vegetables, do not fill the inner pot more than 1/2 full.
- After the cooking process has started, you can press **Cancel** at any time to end the program. The cooker then goes to standby mode.
- Follow the steps in "Getting Started" pages 12 14.
- Position the steam release handle to Sealing.



3 Connect the power cord. The LED displays **OFF**, indicating that the cooker is in standby mode.



Select a pressure cooking program: Soup/Broth, Meat/Stew, Bean/Chili, Poultry, Rice, Multigrain, Porridge, Steam, or Pressure Cook.



Pressure Cooking

5 Optionally, personalize pressure cooking programs as follows:

To do this	Press this button	Followed by these steps
Change the cooking time	Cooking Program Key	Select between three preset cooking times, Normal, Less and More by pressing the cooking program key repeatedly
	+/-	Add/subtract time; press and hold for faster changes
Change the cooking pressure	Pressure Level	Select either High or Low
Set the delayed cooking time	Delay Start	Use the +/- buttons to set the hours Press Delay Start again Use the +/- buttons to set the minutes

10 seconds after choosing the settings, the cooker beeps 3 times and displays **On** to indicate that the cooker has entered preheating cycle. If using **Delay Start**, the **Delay Start** light indicator will light up and 10 seconds after selecting this program, the delayed cooking time count down will begin. When count down is finished, the cooker will display **On** for the preheating cycle. Depending on the amount of food and its temperature, the preheating cycle can last from a few minutes to 40 minutes or more. As the cooker heats up and pressure builds, the float valve rises. When working pressure is reached, the cooker enters the pressure cooking cycle and displays the remaining cooking time.

When the cooking cycle has finished, the cooker beeps and enters the **Keep Warm** mode if the **Auto Keep Warm** function is turned **ON**. The LED displays the elapsed time (such as **L0:02**). If **Cancel** is not pressed, the cooker turns **OFF** after 10 hours.



**Users can switch Auto Keep Warm ON/OFF, adjust pressure level and cooking time at any time during the cooking process.



Pressure Cooking



Release the pressure using one of the following methods (refer to recipe):

Natural Release: Allow the cooker to cool down naturally until the float valve drops down. This may take 10 to 40 minutes, or even more, depending on the amount of food in the cooker. Place a wet towel on the metal part of the lid to speed up cooling (do not cover the steam release valve).

Quick Release: Turn the steam release handle to the **Venting** position to let steam out until the float valve drops down. Never pull out the steam release handle while releasing steam as escaping steam is extremely hot and can cause scalds. For food with large liquid volume or starch content, use **Natural Release** instead as thick liquid may splatter out.





Do not place hand over steam release valve



Do not lean face over cooker when it is in operation or releasing steam/pressure



Press Cancel. The LED displays OFF, indicating that the cooker is in standby mode. Open the lid. Make sure the float valve is down before opening the lid.



The following non-pressure cooking programs are available: Sauté, Slow Cook, Yogurt and Keep Warm.

Sauté

- Connect the power cord. The LED displays **OFF**, indicating that the cooker is on standby.
- Select the Sauté program.
- To change the cooking temperature, press **Sauté key** repeatedly to select between **Normal** (for regular stir-fry), **Less** (for simmering or thickening sauce) and **More** (for pan searing or browning meat).

10 seconds after choosing the settings, the cooking process will start. The cooker beeps 3 times and the LED displays **On** to indicate that the cooker has entered the preheating cycle. When the working temperature is reached, the LED displays **Hot**.



- Add food to the inner pot and sauté.
- When you have finished sautéing the food, press **Cancel**. The LED displays **OFF**, indicating that the cooker is in standby mode.

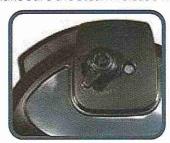


- Do not put the pressure cooker lid on for **Sauté** program. There will be warning alerts and the display will flash. A glass lid with a venting hole may be used.
- As a safety precaution, the cooker automatically enters standby mode after 30 minutes if you have not pressed Cancel.



Slow Cook

You may use the Instant Pot® glass lid as an option. If using the pressure cooking lid, make sure the steam release handle is turned to **Venting**.



- Connect the power cord. The LED displays OFF, indicating that the cooker is on standby.
- Select the Slow Cook program.
- Optionally, modify the slow cooking program as follows:

To do this	Press this button	Followed by these steps
Change the cooking time	+/-	Add / subtract time; press and hold for faster changes
Change the cooking temperature	Cooking Program Key	Select between three preset cooking temperatures, Normal , Less and More by pressing the cooking program key repeatedly
Set the delayed cooking time	Delay Start	Use the + / - buttons to set the hours Press Delay Start again Use the + / - buttons to set the minutes

10 seconds after choosing the settings, the cooking program will start. The cooker beeps 3 times and the cooker enters the cooking cycle. The LED displays the remaining cooking time. If using **Delay Start**, the **Delay Start** light indicator will light up and 10 seconds after selecting this program, the delayed cooking time count down will begin. When count down is finished, the cooking time begins.

- When the cooking cycle has finished, the cooker beeps and enters the Keep Warm mode if the **Auto Keep Warm** program is turned **ON**. The LED displays the elapsed time (such as **L0:02**). If **Cancel** is not pressed, the cooker turns **OFF** after 10 hours.
- 6 If the lid is on, remove it by turning counterclockwise and lifting.
- Press Cancel. The LED displays OFF, indicating that the cooker is in standby mode.

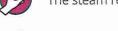
Yogurt

- Pasteurize Milk
 - a) Add milk to the inner pot.
 - b) Select the Yogurt program.
 - c) Press the **Yogurt** key repeatedly to select the **More** mode. 10 seconds after choosing the settings, the heating process starts. The cooker beeps 3 times and the LED displays **boil**.
 - d) When finished, the cooker beeps and the LED displays Yogt.

To make yogurt in containers: fill containers 90% full with milk, add 1 cup/250 ml water to the inner pot, place the containers on the steam rack in the inner pot, close the lid, select the **Steam** program and use the +/- buttons to set time to 2 minutes. Make sure the steam release handle is in **Sealing** position when running the **Steam** program as this is a pressure cooking program. When complete, use the natural release method (refer to page 17) and continue with steps 2 to 4.

*The advantages of pasteurizing milk are to 1) kill pathogens and harmful bacteria, and 2) denature milk proteins for easier absorption by the body.

- 2 Cool Milk
 - a) Remove the inner pot and place it on a wire rack.
 - b) Allow the milk to cool to 115°F/46°C. Test the milk temperature with a thermometer.
- Add Starter Culture
 - a) Add starter culture to the warm milk in the inner pot.
 - b) Replace the inner pot and close the lid.



The steam release handle can be left in Venting or Sealing position.

- 4 Ferment Yogurt
 - a) Select the Yogurt program.
 - b) Press + / to set fermentation time.
 - c) When finished, the cooker beeps and the LED displays Yogt.



Cooking and Safety Tips



- Extreme caution should be taken when moving the steam release handle to **Venting** position. Keep hands and face away from the steam release openings. Failure to comply may result in scalding or serious injury.
- Do not open the lid until pressure inside the cooker is completely released. As a safety feature, until the float valve drops down the lid is locked and cannot be opened. **Do not force lid open.**
- When opening the lid, the inner pot may adhere to the lid. This is caused by vacuum due to cooling. Make sure the steam release valve is in the **Venting** position and all the steam is released.
- If the float valve is stuck, move the steam release handle to the **Venting** position. Once all the steam is released, push the float valve down with a pen or long stick.
- Always add at least 18 fl oz / 500 mL of water or other liquids so enough steam can be generated to cook under pressure. These include cooking sauces, wine, beer, stocks, juices of fruits and vegetables. Oils, oil-based sauces and thick cooking sauces do not have enough water content and will not account for the required liquid volume.
- Time to pressure and cooking time will vary according to the temperature and quantity of the ingredients. Food that is cold or frozen will take longer to cook than food that is at room temperature.
- · When using the Delay Start program, allow sufficient cooling down time before serving.
- The Delay Start program is not recommended for porridge, oatmeal or other foamy and thick liquids. Cooking progresses should be monitored when cooking these foods.

Care and Cleaning



Unplug your Instant Pot® and let it cool to room temperature before cleaning.

- All Instant Pot® inner pots, pressure cooker lids, glass lids, and accessories are dishwasher safe.
- Remove the inner pot and lid and wash with detergent. Rinse with clear water and wipe dry with a soft cloth.
- Wipe the inner cooker base rim and slot dry with cloth to prevent rusting of the exterior cooker rim.
- Remove the sealing ring and anti-block shield from the underside of the lid. Wash with warm, soapy water, rinse with clear water and wipe dry with a soft cloth.
- The sealing ring must always be properly positioned on the underside of the lid.
- Clean the outer body with a damp soft cloth or sponge.
- Never use harsh chemical detergents, scouring pads or powders on any of the parts or components.
- Periodically check that the steam release valve and float valve are in good working order and free of debris.

Troubleshooting

If you experience any problems with the cooker, need technical assistance or product return information, please contact the Instant Pot support team using the methods below:

- Create a support ticket: www.lnstantPot.com/support/
- Email: support@instantpot.com
- · Call 1-800-828-7280 for the customer care team.

You can also find tips, videos and FAQs on www.InstantPot.com/faq/

The issues in the following tables do not always indicate a faulty cooker. Please examine the cooker carefully before contacting the support for repair.

Problem	Possible reason	Solution
Difficulty with closing the lid	Sealing ring not installed properly	Position the sealing ring well
	Float valve in the popped-up position	Slightly press the float valve downward
Difficulty with opening the lid	Pressure inside the cooker	Position the steam release handle to the venting position to release the internal pressure. Open the lid after the pressure is completely released
	Float valve stuck at the popped-up position	Press the float valve lightly with a pen or long utensil

Troubleshooting

Problem	Possible reason	Solution
Steam leaks from the side	No sealing ring	Install the sealing ring
of the lid	Sealing ring damaged	Replace the sealing ring
	Food debris attached to the sealing ring	Clean the sealing ring
	Lid not closed properly	Open then close the lid again
Steam leaks from float valve for over 2 minutes	Food debris on the float valve silicone seal	Clean the float valve silicone seal
	Float valve silicone ring worn- out	Replace the float valve silicone ring
Float valve unable to rise	Too little food or water in inner pot	Add water according to the recipe
	Float valve obstructed by the lid locking pin	Close the lid completely, see "Getting Started" section
Steam comes out from the steam release valve non-stop	Steam release valve not in sealing position	Turn the steam release handle to the sealing position
	Pressure control fails	Contact support
Display flashes "Lid"	Lid is not in the correct position for the selected program	Close the lid for pressure cooking or open the lid for sautéing
Display remains blank after connecting the power cord	Bad power connection or no power	Inspect the power cord to ensure a good connection, check if the power outlet is active
	Cooker's electrical fuse has blown	Contact support

Troubleshooting

10

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Problem		Possible reason	Solution
All LEDs flash with a C1		Faulty temperature sensor	Contact support
code appearing on screen and the warning beep is ON	C2	Faulty temperature sensor	Contact support
	C5	Temperature is too high because inner pot is not placed into the cooker base	Insert the inner pot properly
		Temperature is too high because there is no water in inner pot	Put food and water in the inner pot
	C6	Faulty pressure sensor	
	C6H	Faulty HIGH pressure sensor	Contact support
	C6L	Faulty LOW pressure sensor	
Rice is half cooked or too hard		Too little water	Adjust dry rice and water ratio according to recipe
		Lid opened too early	After cooking cycle completes, leave the lid on for 5 more minutes
Rice is too soft		Too much water	Adjust dry rice and water ratio according to recipe
The cooker beeps 5 times and displays the message "burn" after the cooking program started.		Indication of overheating. The cooker has reduced the heating temperature, and may not reach cooking pressure	Starch deposits at the bottom of the inner pot might have clogged heat dissipation. Stop the cooker and inspect the bottom of the inner pot
Occasional ticking or light cracking sound		The sound of power switch- ing and expanding pressure board when changing temperature	This is normal
		Bottom of the inner pot is wet	Wipe bottom of the inner pot dry before cooking

Warranty

Limited Warranty

This Limited Warranty is effective for one year from the date of original consumer purchase. Proof of original purchase date and, if requested by an authorized Instant Pot Company ("IPC") representative, return of your appliance as IPC may direct at IPC's expense, is required to obtain service under this Limited Warranty.

When this appliance is operated and maintained in accordance with written instructions attached to or furnished with the product, Instant Pot Company will pay for either (i) repair labor to correct defects in materials or workmanship that existed when this appliance was purchased or (ii), at its sole and exclusive discretion, replace the appliance for a period of one (1) year from the date of purchase. In the event that your appliance is replaced, the Limited Warranty on the replacement appliance will expire at the original date (i.e. 12 months from the original purchase date).

This Limited Warranty extends only to the original purchaser and use of the appliance in the United States of America and Canada. This warranty does not cover units that are used outside of the United States of America and Canada.

Any modification or attempted modification to your appliance may interfere with the safe operation of the appliance and will void this Limited Warranty. This Limited Warranty does not apply in respect of any appliance or any part thereof that has been altered or modified from its factory settings unless such alterations or modifications were expressly authorized by an IPC representative.

IPC is not responsible for shipping costs related to warranty service, save and except for shipping costs associated with the return of your appliance as provided herein.

Limitation and Exclusions

The liability of IPC, if any, for any allegedly defective appliance or part shall in no circumstances exceed the purchase price of a comparable replacement appliance.

This Limited Warranty does not cover:

- Damage resulting from accident, alteration, misuse, abuse, neglect, unreasonable use, use contrary to the
 operating instructions, normal wear and tear, commercial use, improper assembly, disassembly, failure to
 provide reasonable and necessary maintenance, fire, flood, acts of God or repair by anyone unless directed
 by an Instant Pot Representative.
- 2. Repairs where your appliance is used for other than normal, single-family household use or when it is used in a manner that is contrary to published user or operator instructions.
- Use of unauthorized parts and accessories, or repairs to parts and systems resulting from unauthorized repairs or modifications made to this appliance.

The cost of repair or replacement under these excluded circumstances shall be borne by you.

Warranty

Disclaimer of Implied Warranties

IMPLIED WARRANTIES, INCLUDING ANY WARRANTIES OF MERCHANTABILITY OR IMPLIED WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE, ARE HEREBY LIMITED TO ONE YEAR OR THE SHORTEST PERIOD ALLOWED BY LAW. Some states or provinces do not allow limitations to the duration of implied warranties of merchantability or fitness, so this limitation may not apply to you.

Disclaimer of Representations Outside of Warranty

IPC makes no representation about the quality, durability, or need for service or repair of this appliance other than the representations contained in this warranty.

Limitation of Remedies; Exclusion of Incidental and Consequential Damage

YOUR SOLE AND EXCLUSIVE REMEDY UNDER THIS LIMITED WARRANTY SHALL BE PRODUCT REPAIR OR REPLACEMENT AS PROVIDED HEREIN. IPC SHALL NOT BE LIABLE FOR INCIDENTAL OR CONSEQUENTIAL DAMAGES ARISING OUT OF OR IN CONNECTION WITH THE USE OR PERFORMANCE OF THE APPLIANCE OR DAMAGES WITH RESPECT TO ANY ECONOMIC LOSS, PERSONAL INJURY, LOSS OF PROPERTY, LOSS OF REVENUES OR PROFITS, LOSS OF ENJOYMENT OR USE, COSTS OF REMOVAL, INSTALLATION OR OTHER CONSEQUENTIAL DAMAGES OF WHATSOEVER NATURE.

You the buyer may have other rights and remedies under your state's or province's applicable laws, which are in addition to any right or remedy which may be available under this limited warranty.

Warranty Registration and Service

Please visit http://instantpot.com/support/register/ to register your new Instant Pot and validate your warranty within thirty (30) days of purchase. You will be asked to provide the store name, date of purchase and model number (found on the base of your cooker) along with your name and address. The registration will enable us to keep you up to date with product developments, recipes and contact you in the unlikely event of a product safety notification. By registering, you acknowledge to have read and understood the instructions for use, and warnings set forth in the accompanying instructions.

To obtain service under this warranty, please call the Customer Care Team at 1-800-828-7280. If IPC is unable to resolve the problem, you may be asked to send your appliance to the Appliance Service Department for quality inspection. IPC is not responsible for shipping costs related to warranty service, save and except for shipping costs associated with the return of your appliance from Canada or within the 48 contiguous states and the District of Columbia of the United States of America, as provided herein. When returning your appliance, please include your name, address, phone number, proof of the original purchase date as well as a description of the problem you are encountering with the appliance.



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To enhance your experience with Instant Pot, join the official Instant Pot Community













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